1 2 3 4 5 6 7 8 9 10 11	RICHARD A. MARSHACK, #107291 rmarshack@marshackhays.com LAILA MASUD, #311731 lmasud@marshackhays.com MARSHACK HAYS LLP 870 Roosevelt Irvine, California 92620 Telephone: (949) 333-7777 Facsimile: (949) 333-7778 Gerald Singleton, SBN 208783 Gary LoCurto, SBN 270372 SINGLETON LAW FIRM, APC 450 A Street, 5th Floor San Diego, CA 92101 Tel: (619) 771-3473 Email: gerald@slffirm.com glocurto@slffirm.com Attorneys for Alma Eugenio Fuentes, Tito Fuentes, Jr., and Tito Fuentes III,	
12	SLF Fire Victim Claimants	
13	NORTHERN DISTR	ANKRUPTCY COURT CICT OF CALIFORNIA
14	SAN FRANC.	ISCO DIVISION
15	In re) Case No. 19-30088 (DM)
16	PG&E CORPORATION,) Chapter 11
17	and)
18	PACIFIC GAS AND ELECTRIC COMPANY) (Lead Case–Jointly Administered)
19	Debtors	MOTION TO ALLOW/DEEM TIMELY LATE FILING OF PROOF OF CLAIM BY ALMA EUGENIO FUENTES, TITO
202122	Affects: PG&E Corporation Pacific Gas & Electric Company	FUENTES, JR., AND TITO FUENTES, III; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF GARY LOCURTO IN SUPPORT
23	Both Debtors	Date: August 25, 2020
24	* All papers shall be filed in the Lead	Time: 10:00 a.m. (Pacific)
25	Case,	Place: Telephonic Appearances OnlyUnited States Bankruptcy
	No. 19-30088 (DM).	Court: Courtroom 17, 16th Floor
26		San Francisco, CA 94102
27		Objection Deadline: August 18, 2020
28		J

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/31/20 18:16:42 Page 1 of 33

6

13 14

15 16

17

18 19

21

20

23

22

24

25 26

27

28

Case: 19-30088

Doc# 8612

TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED **PARTIES:**

The Singleton Law Firm ("SLF") and Marshack Hays LLP, together with several other firms, represent thousands of victims ("SLF Claimants") of the fires started by PG&E in 2015 ("Butte Fire"), 2017 (the twenty fires generally referred to as the "North Bay" and "Wind Complex Fires"), 2018 ("Camp Fire") and 2019 ("Kincade Fire" and "LaFayette Fire").

SLF respectfully file this motion on behalf of Alma Eugenio Fuentes, Tito Fuentes, Jr., and Tito Fuentes, III (collectively "Movants") to deem timely a late filed proof of claim ("Motion").

I. **Summary of Argument**

A proof of claim may be deemed timely upon a showing of excusable neglect and lack of prejudice. In this case, due to miscommunications with prior counsel, Movants were unable to timely file their proofs of claim for damages arising from the Tubbs Fire. Because there is no danger of prejudice to the Debtors as Debtors' estates are solvent, and all creditors stand to be paid, the Motion should be granted to allow these survivors to have their claims deemed timely. This Court must determine whether to grant the Motion.

II. **Factual Background**

Movant's Claims Arising From Tubbs Fire¹

Creditors Alma Eugenio Fuentes ("Alma"), Tito Fuentes, Jr. ("Tito Jr."), and Tito Fuentes, III ("Tito III") are all survivors of the 2017 Tubbs Fire.

In November of 2017, Alma and Tito Jr. contacted Ahmed Diab of Diab, Dixon and Chambers regarding potential claims of Alma's mother, Gemma Deocamp Eugenio ("Mother"), and other family members², related to the total loss of real property located at 5950 Haire Lane Napa, CA 94559 ("Property") as a result of the Tubbs Fire. The Property was held in the name of a trust called The

Filed: 07/31/20 Entered: 07/31/20 18:16:42 Page 2 of

¹ See, Declaration of Gary LoCurto, ¶¶6-15.

² The family members were Michelle Doromal Deocampo, Alymar Reuben Eugenio, Annelise Margaret Eugenio, Ariel Joseph Eugenio, and Christina Eugenio ("Family Members").

Gemma Eugenio Revocable Trust 2018 ("Trust"). The Property served as both a personal residence and a residential care facility called Celebrity Haven 1 ("Business").

Mr. Diab was under the impression that Alma, did not have any claims related to the Tubbs fire, as (i) Alma never mentioned, Tito Jr., and Tito III lived at the Property; (ii) Alma never mentioned she worked at the Business.

Thus, proofs of claim where timely filed³ on behalf of Mother, Trust, Business and all of the Family Members, but not Movants.

On Monday July 13, 2020 SLF contacted one of the Family Members, Alymar Eugenio, to address outstanding inquiries related to the Trust and Business.

On Tuesday, July 14, 2020 SLF received a voicemail from Alymar's sister, Alma, indicating she was the contact person for the Trust, Business and Family Members. Further, Alma emailed SLF with a list of all parties, including Movants for whom SLF never received executed retainers.

On Wednesday, July 15, 2020 SLF contacted Alma, explaining how there was no record of Movants in SLF's files. Further SLF, asked Alma if she had copies of the executed retainers which she said she did not have.

On Thursday, July 16, 2020 SLF inquired whether Alma had any email receipts, and/or other case-related paperwork addressed to her, Tito Jr., and Tito III. Alma then forwarded her two email chains between Alma, and attorney Mr. Diab from November 2017.

Ultimately, SLF contacted Alma on July 17, 2020, and learned all three individuals resided at the Property and that Alma was the director of the Business.

Due to miscommunications between Diab Dixon and Chambers and Movants, SLF did not receive information related to Movants in order to to timely complete Movants' proof of claim. As such, no proofs of claim were *timely* filed on behalf of Movants.

On July 24, 2020, SLF filed claim number TKIDQ27402[[CSLT#4025#CF]],

RZACC27402[[CSLT#4025#CF]], and NOPM#27402[[CSLT#4025#CF]] on behalf of Alma, Tito Jr.,
and Tito III ("Subject Proofs of Claim"). True and correct copies of the Subject Proofs of Claim are

_

Case: 19-30088

³ All claims were filed on Octobr 18, 2019.

collectively attached to the LoCurto Declaration as Exhibit "1."

Thus, SLF now brings Motion to have the Subject Proofs of Claim deemed timely.

B. Pertinent Bankruptcy Background

On January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company ("Debtors" or "PG&E") commenced with the Court voluntary cases ("Chapter 11 Cases") under chapter 11 of the United States Code ("Bankruptcy Code"). PG&E's chapter 11 filings were necessitated by a confluence of factors resulting from catastrophic fires that occurred in Northern California prior to the Petition Date, and PG&E's potential liabilities arising therefrom.

The deadline for filing proofs of claim with respect to any prepetition claim including, but not limited to, all claims of Fire Claimants, Wildfire Subrogation Claimants, Governmental Units and Customers, and for the avoidance of doubt, including all secured claims and priority claims, against either of the Debtors was October 21, 2019 at 5:00 p.m. ("General Bar Date").

The deadline for filing claims was extended to December 31, 2019 ("Extended Bar Date"), solely for the benefit of any non-governmental Fire Claimants who did not filed Proofs of Claim by the General Bar Date. *See*, Dk. No. 4672.

On January 31, 2020, as Dk. No. 5590, the Debtors filed an Amended Chapter 11 Plan Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated January 31, 2020

On February 7, 2020, as Dk. No. 5700, the Debtors filed a Disclosure Statement for the Amended Plan.

On February 19, 2020, as Dk. No. 5835, the Debtors filed Motion for Entry of an Order (I) Approving Form and Manner of Notice of Hearing on Proposed Disclosure Statement; (II) Establishing and Approving Plan Solicitation and Voting Procedures; (III) Approving Forms of Ballots, Solicitation Packages, and Related Notices; and (IV) Granting Related Relief (the "Solicitation Procedures Motion"). On March 17, 2020, the Solicitations Procedures Motion was approved.

After filing multiple iterations of the plan, on June 19, 2020, as Dk. No 8048, the Debtors filed an Amended Joint Chapter 1 Plan of Reoganization dated June 19, 2020 ("Final Plan").

On June 20, 2020, post-voting and hotly contested confirmation hearings, the bankrutpcy

Case: 19-30088

court entered an order confirming the Final Plan. See, Dk. No. 8053.

III. Legal Argument

In a Chapter 11 case, the time to file a proof of claim may be extended under certain circumstances. Fed. R. Bank. Pro. 3003(c)(3); Fed. R. Bank. Pro. 9006(b)(1). The bankruptcy court has "broad equitable powers" in a Chapter 11 case with respect to the timing requirement for proofs of claim. *Pioneer Inventory Services v. Brunswick Associates Limited Partnership*, 507 U.S. 380, 389 (1993). All in all, Rule 9006(b)(1) allows "late filings caused by inadvertence, mistake, or carelessness, not just those caused by intervening circumstances beyond the party's control." *Id.*, at 381. Even a creditor that did in fact receive notice may file a proof of claim notwithstanding the expiration of a claims bar date in a Chapter 11 case upon a showing of "excusable neglect." *Id.* at 394-95 ("Had respondents here been prevented from complying with the bar date by an act of God or some other circumstance beyond their control, the Bankruptcy Court plainly would have been permitted to find 'excusable neglect' [under FRBP 9006].").

In considering whether a creditor's failure was the product of "excusable neglect," the court should take "account of all relevant circumstances surrounding the party's omission," including "the danger of prejudice to the debtor, the length of the delay and its potential impact on judicial proceedings, the reason for the delay, including whether it was within the reasonable control of the movant, and whether the movant acted in good faith." *Id.* at 395; *see also Corning v. Corning (In re Zilog, Inc.)*, 450 F.3d 996 (9th Cir. 2006) (noting *Pioneer*'s non-exhaustive list of relevant factors). Again, a late-filed proof of claim is allowable where a creditor had actual notice of the bankruptcy but, due to some external reason, failed to file a proof of claim or did not realize that she had to, before the bar date. *See, e.g., ZiLOG, Inc. v. Corning (In re ZiLOG, Inc.)*, 450 F.3d 996, 1003-07 (9th Cir. 2006) (applying the *Pioneer* factors). All in all, Rule 9006(b)(1) allows "late filings caused by inadvertence, mistake, or carelessness, not just those caused by intervening circumstances beyond the party's control." *Pioneer*, 507 U.S. at 381. Here, consideration of all four *Pioneer* factors—as well as a fifth engrafted onto the *Pioneer* analysis by some courts—weighs in favor of Movants.

Because in this case there is no danger of prejudice to the Debtors, the first *Pioneer* factor weighs overwhelmingly in Movant's favor. Debtors' estates are solvent, and all creditors stand to be

```
1
     paid. See, e.g., In re Best Payphones, Inc., 523 B.R. 54, 75-6 (Bankr. S.D.N.Y. 2015) and In re
 2
     Sheehan Mem'l Hosp., 507 B.R. 802, 803 (Bankr. W.D.N.Y. 2014) (where the chapter 11 estate is
 3
     solvent, "the proper remedy for a late filing is not the expungement of a claim, but its allowance as a
 4
     tardily filed claim only.). Secondly, immediately, upon receiving all the necessary information the
 5
     Subject Proofs of Claim was filed. Thirdly, the delay in filing the Subject Proofs of Claim is
 6
     reasonable considering immediately upon becoming aware that he may be compensated for damages
 7
     suffered, a proof of claim was filed by SLF on behalf of Movants'. Lastly, any prospect of prejudice
 8
     beyond solvency is unlikely given (a) distributions have not been made; and (b) the value of Movants'
     claims relative to the value of Debtors' estates is low. See, e.g., In re Keene Corp., 188 B.R. 903, 910
 9
10
     (Bankr. S.D.N.Y. 1995) (size of the late claim in relation to the estate is a consideration in determining
11
     prejudice).
12
     ///
13
     ///
14
15
16
     ///
17
18
     ///
19
20
     ///
21
     ///
22
23
24
     ///
25
26
     ///
27
28
     ///
```

6 Entered: 07/31/20 18:16:42 Page 6 of Case: 19-30088 Filed: 07/31/20 Doc# 8612

1 IV. **Conclusion** 2 For the reasons set forth above, the Movant respectfully request that this Court enter an order 3 pursuant to Bankruptcy Rule 9006(b)(1) as follows: 4 1. Granting the Motion; 2. 5 Finding that Subject Proofs of Claim filed by Movants are to be allowed as having been timely filed; 6 Granting such other or further relief as the Court deems just and proper. 7 3. 8 Dated: July 29, 2020 MARSHACK HAYS LLP 9 By: /s/ Laila Masud RICHARD A. MARSHACK 10 LAILA MASUD Attorneys for SLF CLAIMANTS 11 12 Dated: July 30 , 2020 SINGLETON LAW FIRM, APC 13 By: /s/ Gerald Singleton **GERALD SINGLETON** 14 **GARY LOCURTO** 15 Attorneys for the SINGLETON LAW FIRM FIRE VICTIM CLAIMANTS 16 17 18 19 20 21 22 23 24 25 26 27 28

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/31/20 18:16:42 Page 7 of

Declaration of Gary LoCurto

I, GARY LOCURTO, say and declare as follows:

- 1. I am an individual over 18 years of age and competent to make this Declaration.
- 2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.
- 3. The facts set forth below are true of my personal knowledge except for information related to Mr. Diab's communications with Movants' which I learned second-hand through review of documents and communications with Mr. Diab and Alma Eugenio Fuentes.
- 4. I am an attorney at Singleton Law Firm and I make this declaration in support the Motion to Allow/Deem Timely Late Filing of Proof of Claim ("Motion").
- 5. Creditors Alma Eugenio Fuentes ("Alma"), Tito Fuentes, Jr. ("Tito Jr."), and Tito Fuentes, III ("Tito III") are all survivors of the 2017 Tubbs Fire.
- 6. I am informted that, in November of 2017, Alma and Tito Jr. contacted Ahmed Diab of Diab, Dixon and Chambers regarding potential claims of Alma's mother, Gemma Deocamp Eugenio ("Mother"), and other family members⁴, related to the total loss of real property located at 5950 Haire Lane Napa, CA 94559 ("Property") as a result of the Tubbs Fire. The Property was held in the name of a trust called The Gemma Eugenio Revocable Trust 2018 ("Trust"). The Property served as both a personal residence and a residential care facility called Celebrity Haven 1 ("Business").
- 7. I am informed⁵ that Mr. Diab was under the impression that Alma, did not have any claims related to the Tubbs fire, as (i) Alma never mentioned, Tito Jr., and Tito III lived at the Property; (ii) Alma never mentioned she worked at the Business.
 - 8. Thus, proofs of claim where timely filed⁶ on behalf of Mother, Trust, Business and all

⁴ The family members were Michelle Doromal Deocampo, Alymar Reuben Eugenio, Annelise Margaret Eugenio, Ariel Joseph Eugenio, and Christina Eugenio ("Family Members").

⁵ Per my communications and correspondences with Mr. Diab:

⁶ All claims were filed on Octobr 18, 2019.

Doc# 8612

Case: 19-30088

Filed: 07/31/20 Entered: 07/31/20 18:16:42 Page 8 of

⁽i) he was under the impression that Alma Fuentes, who was his only contact with the family, did not have any claims related to the fire;

⁽ii) it was his custom and practice to fully explore all avenues of recovery for all potential claims and plaintiffs; (iii), at no point did any damages for Alma or her husband Tito Fuentes Jr., and son, Tito R Fuentes III become apparent; (iv) Alma never mentioned at any point she and her son and husband lived at the affected property, or that Alma worked at Celebrity Haven 1.

of the Family Members, but not Movants.

- 9. On Monday July 13, 2020 my firm contacted one of the Family Members, Alymar Eugenio, to address outstanding inquiries related to the Trust and Business.
- 10. On Tuesday, July 14, 2020 my firm received a voicemail from Alymar's sister, Alma, indicating she was the contact person for the Trust, Business and Family Members. Further, Alma emailed my firm with a list of all parties, including Movants for whom SLF never received executed retainers.
- 11. On Wednesday, July 15, 2020 my firm contacted Alma, explaining how there was no record of Movants in SLF's files. Further my firm, asked Alma if she had copies of the executed retainers which she said she did not have.
- 12. On Thursday, July 16, 2020 SLF inquired whether Alma had any email receipts, and/or other case-related paperwork addressed to her, Tito Jr., and Tito III. Alma then forwarded her two email chains between Alma, and attorney Mr. Diab from November 2017.
- 13. Ultimately, I contacted Alma on July 17, 2020, and learned all three individuals resided at the Property and that Alma was the director of the Business.
- 14. Due to miscommunications between Diab Dixon and Chambers and Movants, SLF did not receive information related to Movants in order to to timely complete Movants' proofs of claim. As such, no proofs of claim were *timely* filed on behalf of Movants.
- 15. On July 24, 2020, SLF filed claim number TKIDQ27402[[CSLT#4025#CF]], RZACC27402[[CSLT#4025#CF]], and NOPM#27402[[CSLT#4025#CF]] on behalf of Alma, Tito Jr., and Tito III ("Subject Proofs of Claim"). True and correct copies of the Subject Proofs of Claim are collectively attached as Exhibit "1."

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 30, 2020.

GARY LOCURTO

Any Ludet

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: **Identify the Claim** 1. Who is the current Fuentes, Alma Eugenio creditor? Name of the current creditor (the person or entity to be paid for this claim) Has this claim been ✓ No acquired from Yes, From whom? someone else? If you checked "Yes", please provide the full name of each family member that you are filing on 3. Are you filing this claim 🗸 No on behalf of your behalf of: family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family. Where should notices to the creditor be sent? Where should notices Where should payments to the creditor be sent? and payments to the (if different) creditor be sent? Name Fuentes, Alma Eugenio Federal Rule of Attomey Name (if applicable) Gerald Singleton Bankruptcy Procedure (FRBP) 2002(g) Attorney Bar Number (if applicable) 208783 Attorney Bar Number (if applicable) Street Address 450 A Street, Fifth Floor _{City} San Diego State_California _{Zip Code} 92101 Phone Number 7606971330 Phone Number_ Email Address SLFBKCorres@slffirm.com Does this claim amend ✓ No one already filed? Yes. Claim number on court claims registry (if known)_ MM / DD / YYYY Do you know if anyone ✓ No else has filed a proof Yes. Who made the earlier filing? of claim for this claim?

Proof of Claim (Fire Related)

Page 1

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世**ՋԿ֏Ց֏6:4**2**PAGE** 10

F	art 2:	Give Informati	ion A	about the Claim as of the Date this Claim Form is Filed
7.	What fire	is the basis of		Camp Fire (2018)
	your clai	m?	☑	North Bay Fires (2017)
	Check all	that apply.		Ghost Ship Fire (2016)
			Н	Butte Fire (2015)
			Ш	Other (please provide date and brief description of fire:
8.	and/or you suffered home or address, place fro	s) where you our family harm? (e.g. business place of injury, m which you cuated, if		Location(s): 5950 Haire Ln, Napa, CA 94559-9711
9.		you and/or lly harmed?	Z	Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)
	Check all	that apply	7	✓ Owner ☐ Renter ☐ Occupant ☐ Other (Please specify):
				Personal Injury
			片	Wrongful Death (if checked, please provide the name of the deceased)
			K	Lost wages and earning capacity
			7	Loss of community and essential services
			Ħ	A seizu Hungi Lang
			Z	Other (Please specify): Any and all losses recoverable under CA law
10.	What dan	nages are you ur family	Z	Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)
	claiming/	seeking?	V	Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)
	Check all	tnat apply	abla	Punitive, exemplary, and statutory damages
			\mathbf{Z}	Attorney's fees and litigation costs
			\mathbf{Z}	Interest
			\mathbf{A}	Any and all other damages recoverable under California law
			Ш	Other (Please specify):
11.	How muc	h is the claim?	- Colored	
			닏	\$ (optional)
			\checkmark	Unknown / To be determined at a later date

Proof of Claim (Fire Related)

Page 2

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世紀中間 14:00

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim

lectronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.

18 U.S.C. §§ 152, 157, and 3571.

	Check the appropriate box:							
		I am the creditor.						
	✓ I am the creditor's attorney or authorized agent.							
e	I have examined the information in this <i>Proof of Claim</i> and have a reasonable belief that the information is true and correct.							
•	I declare under pe	enalty of perjury	y that the foregoir	ng is true and corr	rect.			
	Signatur	Signature: Gerald Singleton						
Email: SLFBKCorres@slffirm.com								
	Signature							
	Print the name of the person who is completing and signing this claim:							
	Name	Gerald Si	ngleton					
		First name		Middle name	Last name			
	Title	Attorney						
	Company	Singleton	Law Firm					
		Identify the corp	oorate servicer as th	e company if the aut	thorized agent is a servicer.			
	Address	450 A Str	eet, Fifth Flo	or				
		Number	Street					

CA

State

Email

92101

ZIP Code

92101

Proof of Claim (Fire Related)

San Diego

Contact phone

7606971330

Page 3

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世紀16:42 PAGE 12

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):		
I have supporting documentation. (attach below)	X I do not have supporting documentation.	

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世**2**41**6**42**PAGE** 13

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write A.B., a minor child (John Doe, parent). See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form.

 Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of redaction of information below.
- Do not attach original documents because attachments may be destroyed after scanning.
- Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at

https://restructuring.primeclerk.com/pge.

Page 1

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC Grand Central Station, PO Box 4850 New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC 850 Third Avenue, Suite 412 Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center 350 Salem Street Chico, CA 95928

Marysville Service Center 231 "D" Street Marysville, CA 95901

Napa Service Center 1850 Soscol Ave. Ste 105 Napa, CA 94559

Oroville Service Center 1567 Huntoon Street Oroville, CA 95965

Redding Service Center 3600 Meadow View Road Redding, CA 96002

Santa Rosa Service Center 111 Stony Circle Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Page 2

Proof of Claim Instructions (Fire Related)

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3년% பித்ரி: 42 p. இரு 15

Electronic Proof of Claim_TKIDQ27402[[CSLT# 4025#CF]]

Final Audit Report

2020-07-24

Created:

2020-07-24

By:

Prime Clerk E-Filing (efiling@primeclerk.com)

Status:

Signed

Transaction ID:

CBJCHBCAABAA7MulTg5REalKJxTJ78P-dtOLcboVYmcQ

"Electronic Proof of Claim_TKIDQ27402[[CSLT#4025#CF]]" Hist ory

- Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com) 2020-07-24 6:26:26 PM GMT
- Web Form filled in by Gerald Singleton (SLFBKCorres@slffirm.com) 2020-07-24 6:31:43 PM GMT- IP address: 72.192.138.39
- (User email address provided through API User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/84.0.4147.89 Safari/537.36)
 2020-07-24 6:31:46 PM GMT- IP address: 72.192.138.39
- Signed document emailed to Gerald Singleton (SLFBKCorres@slffirm.com) and Prime Clerk E-Filing (efiling@primeclerk.com)

2020-07-24 - 6:31:46 PM GMT

Prime Clerk

rowereday Adobe Sign

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3 2/20 16

of 33

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Clain		aim	
1.	Who is the current creditor?	Fuentes Jr., Tito Rigoberto Name of the current creditor (the person or entity to be paid for this cla	aim)
2.	Has this claim been acquired from someone else?	☑ No ☐ Yes. From whom?	
3.	Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	behalf of:	the full name of each family member that you are filing on
4.	Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name Fuentes Jr., Tito Rigoberto Attorney Name (if applicable) Gerald Singleton Attorney Bar Number (if applicable) 208783 Street Address 450 A Street, Fifth Floor City San Diego State California Zip Code 92101 Phone Number 7606971330 Email Address SLFBKCorres@slffirm.com	Attorney Bar Number (if applicable) Street Address City State Zip Code Phone Number
5.	Does this claim amend one already filed?	No Yes. Claim number on court claims registry (if known)	Filed on MM / DD / YYYY
6.	Do you know if anyone else has filed a proof of claim for this claim?	No Yes. Who made the earlier filing?	

Proof of Claim (Fire Related)

Page 1

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世**2**41**6**42**PAGE 19**

P	art 2:	Give Informat	ion A	about the Claim as of the Date this Claim Form is Filed
7.	What fire	is the basis of		Camp Fire (2018)
	your clai		abla	North Bay Fires (2017)
	Check all	that apply.		Ghost Ship Fire (2016)
				Butte Fire (2015)
			Ш	Other (please provide date and brief description of fire:
8.	and/or you suffered home or address, place fro	s) where you our family harm? (e.g. business place of injury, m which you cuated, if		Location(s): 5950 Haire Ln, Napa, CA 94559-9711
9.	your fam	e you and/or ily harmed? that apply	Z Z	Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) Owner Renter Occupant Other (Please specify): Personal Injury
			Ш	Wrongful Death (if checked, please provide the name of the deceased)
			\mathbf{A}	Business Loss/Interruption
			\mathbf{A}	Lost wages and earning capacity
l				Loss of community and essential services
				Agricultural loss
				Other (Please specify):
10.		nages are you our family	Z	Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)
	•	seeking?	V	Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)
	Check all	that apply	\mathbf{Z}	Punitive, exemplary, and statutory damages
			V	Attorney's fees and litigation costs
			\mathbf{Z}	Interest
			\underline{V}	Any and all other damages recoverable under California law
				Other (Please specify):
11.	How muc	h is the claim?		
			Ш	\$ (optional)
			\checkmark	Unknown / To be determined at a later date

Proof of Claim (Fire Related)

Page 2

Part 3:

Sign Below

The person completing
this proof of claim must
sign and date it.
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

	Check the appropriate box:						
I am the creditor.							
I am the creditor's attorney or authorized agent.							
	I have examined and correct.	I have examined the information in this <i>Proof of Claim</i> and have a reasonable belief that the information is true and correct.					
,	l declare under pe	enalty of perjury that th	ne foregoing is true and correct.				
	Signatur	e: <u>Gerald singl</u>	<u>eton</u> 220 11:50 PDT)				
	Emai	Email: SLFBKCorres@slffirm.com					
	Signature						
	oignature						
	Print the name o	f the person who is o	ompleting and signing this clain	n:			
	Name	Gerald Singlete	on				
		First name	Middle name	Last name			
	Title	Attorney					
	Company	Singleton Law	Firm				
	· · · · · · · · · · · · · · · · · ·	Identify the corporate se	rvicer as the company if the authorized	agent is a servicer.	_		
	Address	450 A Street, F	Fifth Floor				
		Number Street					

CA

State

Email

92101

ZIP Code

92101

Proof of Claim (Fire Related)

San Diego

7606971330

City

Contact phone

Page 3

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3 2/20 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3 2/20 19-30088

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):			
☐ I have supporting documentation. (attach below)	I do <u>not</u> have supporting documentation.		

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世**2**016:42 PAGE 20

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write A.B., a minor child (John Doe, parent). See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form.

 Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of
- Do not attach original documents because attachments may be destroyed after scanning.

redaction of information below.

Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at

https://restructuring.primeclerk.com/pge.

Proof of Claim Instructions (Fire Related) Page 1

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/31/20 Filed: 07/3

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC Grand Central Station, PO Box 4850 New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC 850 Third Avenue, Suite 412 Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center 350 Salem Street Chico, CA 95928

Marysville Service Center 231 "D" Street Marysville, CA 95901

Napa Service Center 1850 Soscol Ave. Ste 105 Napa, CA 94559

Oroville Service Center 1567 Huntoon Street Oroville, CA 95965

Redding Service Center 3600 Meadow View Road Redding, CA 96002

Santa Rosa Service Center 111 Stony Circle Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Proof of Claim Instructions (Fire Related)

Page 2

Electronic Proof of Claim_RZACC27402[[CSLT# 4025#CF]]

Final Audit Report

2020-07-24

Created:

2020-07-24

By:

Prime Clerk E-Filing (efiling@primeclerk.com)

Status:

Signed

Transaction ID:

CBJCHBCAABAA0vHYEiRunbRZpIA2adHrrNRn4QsaWbh2

"Electronic Proof of Claim_RZACC27402[[CSLT#4025#CF]]" His tory

- Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com) 2020-07-24 6:40:19 PM GMT
- Web Form filled in by Gerald singleton (SLFBKCorres@slffirm.com) 2020-07-24 6:50:54 PM GMT- IP address: 72.192.138.39
- (User email address provided through API User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/84.0.4147.89 Safari/537.36) 2020-07-24 6:50:55 PM GMT- IP address: 72.192.138.39
- Signed document emailed to Prime Clerk E-Filing (efiling@primeclerk.com) and Gerald singleton (SLFBKCorres@slffirm.com)

2020-07-24 - 6:50:55 PM GMT

Prime Clerk

rowered by Adobe Sign

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3 2/20 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3 2/20 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3 2/20 19-30088

EXHIBIT 3

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: **Identify the Claim** Who is the current Fuentes III, Tito creditor? Name of the current creditor (the person or entity to be paid for this claim) Has this claim been ✓ No acquired from Yes, From whom? someone else? If you checked "Yes", please provide the full name of each family member that you are filing on 3. Are you filing this claim 🗸 No behalf of: on behalf of your ☐ Yes family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family. Where should notices Where should notices to the creditor be sent? Where should payments to the creditor be sent? and payments to the (if different) creditor be sent? Fuentes III, Tito Federal Rule of Attorney Name (if applicable) Gerald Singleton Bankruptcy Procedure (FRBP) 2002(g) Attorney Bar Number (if applicable) 208783 Attorney Bar Number (if applicable) Street Address 450 A Street, Fifth Floor City San Diego State California State Zip Code 92101 Phone Number 7606971330 Phone Number Email Address SLFBKCorres@slffirm.com Does this claim amend ✓ No one already filed? Yes. Claim number on court claims registry (if known)_ MM / DD / YYYY ✓ No Do you know if anyone else has filed a proof Yes. Who made the earlier filing? of claim for this claim?

Proof of Claim (Fire Related)

Page 1

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世%എ18:42 PA® 24

Ī	art 2: G	ive Informati	on A	bout the Claim as of the Date this Claim Form is Filed
7.	What fire is	the basis of	=	Camp Fire (2018)
	your claim?		=	North Bay Fires (2017)
	Check all tha	it apply.	_	Ghost Ship Fire (2016)
			-	Butte Fire (2015)
			Ц	Other (please provide date and brief description of fire:
L				
8.	What are the location (s) and/or your suffered had home or but address, place from were evacual different.?	where you family rm? (e.g. siness ace of injury, which you		Location(s): 5950 Haire Ln, Napa, CA 94559-9711
9.	How were y your family		Z	Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) Value Renter Occupant Other (Please specify):
	Check all tha	t apply	7	Personal Injury
				Wrongful Death (if checked, please provide the name of the deceased)
			\mathbb{H}	Business Loss/Interruption
			7	Lost wages and earning capacity
			Z	Loss of community and essential services
				Agricultural loss
			Z	Other (Please specify): Any and all losses recoverable under CA law
10.	What damag		V	Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)
	claiming/se	eking?	V	Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)
	Check all tha	т арріу	$\underline{\mathbf{Z}}$	Punitive, exemplary, and statutory damages
			\mathbf{V}	Attorney's fees and litigation costs
			\mathbf{V}	Interest
			M	Any and all other damages recoverable under California law
ļ			<u>Ц</u>	Other (Please specify):
11.	How much i	s the claim?	 1	(antien-1)
			닏	\$(optional)
ĺ			\checkmark	Unknown / To be determined at a later date

Proof of Claim (Fire Related)

Page 2

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3년%中代中代表

Part 3:

Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:						
	am the creditor.					
am the cre	editor's attorney or authorized	d agent.				
I have examined and correct.	I have examined the information in this <i>Proof of Claim</i> and have a reasonable belief that the information is true and correct.					
I declare under p	penalty of perjury that the for	egoing is true and correct.				
Signatu	re: <u>Gerald Singleto.</u>	<u>И</u> 37 РОТ)				
Ema	ail: SLFBKCorres@slffir	m.com				
Signature						
Duta 4 th a second		l. d				
Print the name	of the person who is comp	leting and signing this clair	n:			
Name	Gerald Singleton					
	First name	Middle name	Last name			
Title	Attorney					
Company	Singleton Law Firm					
opay	Identify the corporate servicer as the company if the authorized agent is a servicer.					
Address	450 A Street, Fifth	Floor				
	Number Street					

CA

State

Email

92101

SLFBKCorres@slffirm.com

ZIP Code

Proof of Claim (Fire Related)

San Diego

7606971330

City

Contact phone

Page 3

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/3世紀中代: 42 PAGE 28

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):			
I have supporting documentation. (attach below)	I do not have supporting documentation. ✓		

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/31/20 Entere

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write A.B., a minor child (John Doe, parent). See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form.

 Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of redaction of information below.
- Do not attach original documents because attachments may be destroyed after scanning.
- Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at

https://restructuring.primeclerk.com/pge.

Proof of Claim Instructions (Fire Related)

Page 1

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC Grand Central Station, PO Box 4850 New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC 850 Third Avenue, Suite 412 Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center 350 Salem Street Chico, CA 95928

Marysville Service Center 231 "D" Street Marysville, CA 95901

Napa Service Center 1850 Soscol Ave. Ste 105 Napa, CA 94559

Oroville Service Center 1567 Huntoon Street Oroville, CA 95965

Redding Service Center 3600 Meadow View Road Redding, CA 96002

Santa Rosa Service Center 111 Stony Circle Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Proof of Claim Instructions (Fire Related)

Page 2

Electronic Proof of Claim_NOPM#27402[[CSLT #4025#CF]]

Final Audit Report

2020-07-24

Created:

2020-07-24

Ву:

Prime Clerk E-Filing (efiling@primeclerk.com)

Status:

Signed

Transaction ID:

CBJCHBCAABAAlh2p4WEKEGDb7WKVOjqWT49szrLVB6bD

"Electronic Proof of Claim_NOPM#27402[[CSLT#4025#CF]]" His tory

- Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com) 2020-07-24 6:33:15 PM GMT
- Web Form filled in by Gerald Singleton (SLFBKCorres@slffirm.com) 2020-07-24 6:37:50 PM GMT- IP address: 72.192.138.39
- (User email address provided through API User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/84.0.4147.89 Safari/537.36) 2020-07-24 6:37:52 PM GMT- IP address: 72.192.138.39
- Signed document emailed to Prime Clerk E-Filing (efiling@primeclerk.com) and Gerald Singleton (SLFBKCorres@slffirm.com)

2020-07-24 - 6:37:52 PM GMT

Prime Clerk

rowerenav Adobe Sign

Case: 19-30088 Doc# 8612 Filed: 07/31/20 Entered: 07/31/20 Entere

of 33